

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

---

UNITED STATES

NO. 05-CR-10003-NMG

v.

DEEB HOMSI

---

**MOTION FOR FUNDS FOR TRANSCRIPT OF RULE 11  
HEARING AT GOVERNMENT EXPENSE**

The defendant entered a change of plea on December 16, 2005, pursuant to Fed. R. Cr. P. 11. The hearing addressed several issues, one of which was whether the Court had authority to continue the pretrial release of the defendant after his plea was changed. While the Court did continue the bail of Mr. Homsi until his putative sentencing date of March 21, 2006, it is expected by all parties that the sentencing hearing will be continued until such time as Mr. Homsi's cooperation has concluded, which may be a year or even two years in the future. The Court indicated its disinclination to continue the bail of the defendant past March 21.

The transcript of this hearing will be necessary in order to either prepare a detailed memorandum of law on the issue of post-plea release for the District Court in support of a motion to continue release on conditions or in the pursuit of an appeal to the First Circuit, should that course be deemed advisable by counsel and the defendant.

Respectfully submitted,

*Roger A. Cox*

---

Roger A. Cox BBO# 551514  
Cox & Cox  
30 Main Street  
Ashland, MA 01721-1178  
(508) 231-1460

Attorney for Deeb Homsi

DATED: December 30, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true copy of this Motion has been served by prepaid first-class mail upon AUSA Fred Wyshak, One Courthouse Way, Boston, MA 02210, this 30<sup>th</sup> Day of December, 2005. *Roger A. Cox*